

U.S. DISTRICT COURT

District of Massachusetts

Case No. 14-CV-10239-PBS

KAVEH L. AFRASIABI)
)
 Plaintiff,)
)
 Vs.)
)
Cambridge Police, Et All,)
)
 Defendants.)

FILED
IN CLERK'S OFFICE
2015 AUG 26 AM 11:03
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PLAINTIFF'S EMERGENCY MOTION FOR (A) DISCLOSURE OF INFORMATION REGARDING ASSETS OF DECEASED DEFENDANT CHRISTINE MOSER, AND (B) INJUNCTION ON THE RELEASE OF ASSETS OF DEFENDANT MOSER PENDING THE OUTCOME OF LAW SUIT

Now comes the Plaintiff Afrasiabi, pro se, and files this Motion as an "Emergency Motion" in light of the recent death of Defendant Christine Moser, who had falsely made criminal reports to the police regarding Afrasiabi. Afrasiabi prays the court to order a full disclosure of Moser's assets and her asset holder(s), and to order an immediate injunction that would freeze any partitioning of Moser's assets/inheritance pending the outcome of this law suit.

As grounds for this Motion, Afrasiabi states the following:


1. Defendant Moser had maliciously accused Afrasiabi of making numerous phone calls and text messages to her in 2011;

2. Yet, after discovery in the criminal action brought against Afrasiabi in Cambridge District Court partly as a result of Defendant Moser's false allegations, Moser's telephone records were produced and showed the absence of any phone calls and or texts by Afrasiabi.
3. In late 2013, Afrasiabi after consulting with an attorney wrote a letter to Defendant Moser and cited the proven lies about telephone/texts and gave Moser the options of either apologizing or facing a future law suit. Again, Defendant Moser was unrepentant and contacted the police and alleged harassment by Afrasiabi (who had exercised his constitutional rights vis-à-vis a false accuser). Afrasiabi was then arrested by Cambridge police and spent two days in jail before being released on bail.
4. All the charges against Afrasiabi were dropped on October 7, 2014.

Notwithstanding the above, Defendant Moser was definitely guilty of engaging in a sinister plan to deprive Afrasiabi of his rights and liberties and must be held responsible for his gross misconduct.

WHEREFORE, Plaintiff prays the Court to grant this Emergency Motion in light of the imminent partitioning of Moser's assets.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'K. L. Afrasiabi', written in a cursive style.

Kaveh L. Afrasiabi, Pro Se

August 24, 2015

Certificate of Service: A true copy of this Motion has been served on the opposing counsel on this date, August 24, 2015.